

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROBERT DADE,)	
Plaintiff)	
)	
v.)	CIVIL ACTION NO. 04-30172-MAP
)	
BOLAND BUILDERS, INC.,)	
THOMAS M. BOLAND,)	
STUART JONES, and)	
MARY ROSE JONES,)	

JOINT STATEMENT

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for the above named parties have conferred and state as follows:

1. Joint Discovery Plan and Motion Schedule

The Parties propose the following pre-trial schedule:

- (a) Automatic disclosure to be completed on or before January 29, 2005;
- (b) Amendments and/or supplements to the pleading may be filed by February 28, 2005, subject to the provisions of the Federal Rules of Civil Procedure;
- (c) Written discovery requests are to be filed by May 30, 2005;
- (d) Additional parties to be named by May 30, 2005;
- (e) All depositions to be completed by September 30, 2005 except for expert witnesses;
- (f) The plaintiff's expert witness, if any, shall be designated by November 30, 2005 and defendants' expert witnesses shall be designated within 30 days after the plaintiff discloses said expert(s) as contemplated by Fed. R. Civ. P. 26(b)(4)(A)(1); designation of experts shall include provision of any information required by the Federal Rules of Civil Procedure and/or the Local Rules of the District of Massachusetts; any expert depositions shall be completed within 30 days of the defendants' expert designation;
- (g) All dispositive motions are to be filed by January 30, 2006 and responses are to be filed within the time frame established by Local Rule 7.1(B)(2);
- (h) A final pre-trial conference will be held per order of the Court.

2. The Plaintiff intends to take approximately three depositions during the discovery period, depending on written discovery responses. The Defendant Boland Builders, Inc., and the Defendant Thomas M. Boland intend to take approximately three depositions during the discovery period. The Defendant Stuart Jones and the Defendant Mary Rose Jones

intend to take approximately three depositions.

3. Certification regarding each party's consultation with counsel regarding budgets and alternative dispute resolution will be filed separately.

THE PLAINTIFF
ROBERT DADE

BY: _____

JACK F. ST. CLAIR, ESQ.
BBO #438100
73 Chestnut Street
Springfield, MA 01103
(413) 737-5000 - telephone
(413) 731-1302 - facsimile

THE DEFENDANT BOLAND BUILDERS, INC.,
THOMAS M. BOLAND

BY: _____

NANCY FRANKEL PELLETIER, ESQ.
BBO #544402
Robinson Donovan, P.C.
1500 Main Street, Suite 1600
Springfield, MA 01115
(413) 732-2301 - telephone
(413) 785-4658 - facsimile

THE DEFENDANTS STUART JONES AND
MARY ROSE JONES

BY: _____

DANIEL RIDER, JR., ESQ.
BBO #552354
Law Offices of John N. White
1500 Main Street, Suite 922
Springfield, MA 01115-5369
(413) 788-0200 - telephone
(413) 788-7526 - facsimile

December 3, 2004